



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

-against-

KEITH RANIERE,

**JURY CHARGE
FINAL
18-CR-204 (NGG) (VMS)**

Defendant.

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NICHOLAS G. GARAUFIS, United States District Judge.

Now that the evidence in this case has been presented and the attorneys for the Government and the Defendant have concluded their closing arguments, it is my responsibility to instruct you as to the law that governs this case. My instructions will be in three parts:

First: I will instruct you regarding the general rules that define and govern the duties of a jury in a criminal case;

Second: I will instruct you as to the legal elements of the crimes charged in the Indictment—that is, the specific elements that the Government must prove beyond a reasonable doubt to warrant a finding of guilt; and

Third: I will give you some general rules regarding your deliberations.

Statutory language quoted in this Final Charge is set forth in bold lettering.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

KEITH RANIERE,
also known as "Vanguard,"
"Grandmaster,"
and "Master,"

Defendant.

-----X

AS TO COUNT TWO
Racketeering

How do you find the defendant?

Guilty _____ Not Guilty _____

If you answered "Guilty" as to Count Two, indicate whether the following Racketeering Acts were proved beyond a reasonable doubt. If you answered "Not Guilty," proceed to Count One.

